

AMERICAN FEDERATION OF STATE, COUNTY  
AND MUNICIPAL EMPLOYEES, DISTRICT  
COUNTY 47 HEALTH AND WELFARE FUND, *et  
al.*

Plaintiffs,

V.

PURDUE PHARMA L.P. and THE PURDUE  
FREDERICK COMPANY INC.

## Defendants

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**Civil Action No. 1:07-cv-08761-JGK**

## DECLARATION OF PAULETTE PETERSON

I, Paulette Peterson declare:

1. I am a Senior Legal Assistant. I make this Declaration in support of Purdue's Motion for Judgment on the Pleadings. I have knowledge set forth in this declaration in connection with my position as Senior Legal Assistant, and if called to do so, I could and would competently testify to these matters under oath.
2. By May 13, 2003, 303 individual and putative class actions raising allegations similar to those at issue in this case had been filed against Purdue Pharma L.P. and/or its corporate affiliates.
3. Two third-party payor claims involving allegations similar to those at issue in this case were filed against Purdue on June 11, 2001 and September 17, 2001. *See McGraw v. Purdue Pharma*, No. 01-C-137-S (W.Va. June 11, 2001); *Allied Services Division Welfare Fund v. Purdue Pharma*, No. 2001-L-1458 (Ill. Sept. 17, 2001). True and correct copies of the complaints served on Purdue in these cases are attached hereto as Exhibits A and B, respectively.

I declare under penalty of perjury that the foregoing is true and correct. Executed on  
January 7, 2008.

A handwritten signature in black ink, reading "Pauline Peterson". The signature is written in a cursive style with a horizontal line underneath the name.